



Smucker Quality Beverages, Inc.
Chico, California

November 11, 2005

National Organic Standards Board
C/o Katherine Benham
USDA-AMS-TMP-NOP
Room 4008 South, Ag Stop 0268
1400 Independence Avenue SW
Washington, D.C. 20250

Dear National Organic Standards Board;

Smucker Quality Beverage agrees with the handling committees recommendations to renew substances used in the following categories;

- 205.605 (a) – Nonsynthetics Allowed
- 205.605 (b) – Synthetics Allowed
- 205.606

Smucker Quality Beverage agrees to defer Colors and Flavors. **However, we disagree that there was no technical review conducted for Flavors.** The following historical data is provided to assist the board in the evaluation of Flavors.

NOSB Board Vote and Recommendation on Natural Flavors

- At the October 1995 NOSB meeting in Austin, Texas the final recommendation for the use of Natural Flavors in Organic Foods was voted on and unanimously approved. (see attachment #1). “Prior to the adoption of the recommendation the draft document went out for public comment and was responded to.” (NOSB minutes, Oct. 1995, page 6)

Technical Advisory Report

- In attendance at the October 1995 NOSB meeting was the Technical Advisory Panel Coordinator Zea Sonnabend and other advisors John Brown, Rich Theuer, Lynne Coody, Brian Baker and Bill Wolf. (NOSB minutes, Oct. 1995, page 1)
- The NOP should provide the NOSB with the TAP report on Flavors.

NOSB Concerns/Issues with Flavors in October 1995

- At the time, there was debate as to “whether natural flavors, with certain constraints, are appropriate for use in “organic foods” (95%-100% organic ingredients) or whether natural flavors should be restricted to use in foods “made with organic ingredients” (50-95% organic ingredients only. (Oct. 31, 1995 - NOSB final recommendation, addendum #14).
- The final recommendation included allowance for both the “organic” and “made with organic” label with restrictions in both categories.
- NOSB Board Member Gene Khan, reported that research showed that no flavor houses were currently producing organic natural flavors. Organic Flavors were not commercially available.

SQB's comments on Flavors

In the mid-1990's Smucker Quality Beverage was the first certified organic handler to contract with a flavor house to produce an organic flavor. At that time, we purchased organic grain alcohol and citrus oils, and provided them to the flavor house for manufacture of our organic flavors. We now work with several large flavor houses and continue to urge innovation by replacing Natural Flavors with Organic Flavors in our products.

In 1995 NOSB member Gene Khan reported that organic flavors were not available. (Oct. 1995 NOSB minutes, page). Today, although organic flavors are becoming more available to the handling industry, there are still many that are not commercially available. SQB encourage the NOSB to focus the TAP report on commercial availability and formally seek industry input on the availability of organic flavors.

Sincerely,

Kim Dietz
Regulatory Compliance Manager
P.O. Box 369
Chico, CA 95927

530-899-5058